January 25, 1967

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Dr. Wilfred H. Shields, Acting Chief
Health Department
Solid Waste Division
State Office Building
Annapolis, Maryland 21401

cc: Cecil County Heal
Court House Build.
Elkton, Maryland

Dear Dr. Shields:

This is to advise you of our intent to acquire a 12 acre tract of l
be used for the treatment and disposal of ordinary industrial chemic
Please regard this letter as an indication of our desire to comply w
applicable regulations governing opening and operating such a facilit
notify us of any additional procedures we should follow to obtain app
of our plans.

Other possible site

<u>By referring to our application to the State Department of Water Resourc</u>
<u>for a permit to construct and operate waste treatment facilities</u> at our
plant, dated May 2, 1966, you will note that one of our three types of
waste - heavy residue - was to be disposed of at an off-site location.
This action we are taking is directed toward that end.

The land in question is located in the 3rd district of Cecil County about 2 miles South of Elkton, Maryland, just off Old Elk Neck Road. For ready identification, its southern border is one property removed from the recently opened Cecil County Dump. It is the former George J. Schirling parcel purchased by Reginald Thompson Brown and recorded in Liber RRC No. 104, Folio 137, in the Cecil County records.

<u>Description of the Waste</u>

The solid wastes we would dispose of fall into three categories:

1) Paint and lacquer residues and other polymeric solids.
2) Flattened "heavy" 55 gallon drums lined with hardened polymer on sides and bottom and therefore of no value.
3) Plant debris such as old lumber, waste paper, old buckets, and scrap metal of no value.

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Refuse in the first category would generally be similar to that at the bottom of a sludgy paint can. Thus, resins primarily, along with some pigment and vehicle, would be present in this waste. The material would be viscous and mobile on generation but would harden on exposure due to polymerization of residual vehicle.

The other polymeric residues referred to in this category would be such common plastics as polyvinylchloride, polymethylmethacrylate, and polystyrene, generally, but may include, depending on the type of business we develop, more complex polymers. Like the paint and lacquer residue these polymers are viscous and mobile when produced, but harden upon exposure due to further polymerization and evaporation of minor quantities of residual solvent.

Without exception all solid residues in this category neither react with water nor dissolve in it. Furthermore all these materials are of a low order of toxicity and are commonly used and handled by untrained people without special protective clothing or ventilation.

All wastes under consideration are combustible and burn relatively cleanly without undue odor. Burning would be assisted by minor amounts of residual flammable solvent, paint vehicle, and even lacquer grade nitrocellulose resin. One burning test on the paint and lacquer residue, conducted by Thermal Research and Engineering Corporation of Conshohocken, Pa., resulted in 6.1% residual ash.

Quantity of Waste

Waste in the first category could be generated at a peak rate of 9000 lbs. per day when the plant has reached full capacity. An average value would be approximately 5000 lbs. per day over a six day week. Thus a total of 1.5 million pounds per year would be disposed of.

"Heavy" drums would be disposed of at the rate of 80 drums per month, or about 1000 per year.

Plant debris would accumulate in much lesser quantities, perhaps at the rate of one load per month.

Proposed Method of Disposal

Galaxy's plan is to have a professional driller test bore the tract of land to determine the nature of the underground strata. The land would then be graded to create an elongated containment basin in an area where impermeable material, such as clay, lies underneath. Waste of all categories would then be deposited in the basin and burned load by load. After a reasonable accumulation of ash and residue had taken place the land would be back-filled and the process repeated on the next strip of land. The purpose

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of burning is to reduce the waste volume. Should burning of the waste prove to be a nuisance in the area, then the waste would be backfilled directly without burning.

Administration

Access to the dump site would be restricted to Galaxy's personnel and vehicles by appropriate gates, fencing, signs, and other barriers.

Although Galaxy does not plan to maintain an attendant during daylight hours at the dump initially, this would be done should such supervision become necessary.

Records would be kept at Galaxy's plant office as to approximate quantity and description of the waste dumped each day along with the location and method of disposal.

Yours truly,

GALAXY CHEMICALS, INCORPORATED

Paul J. Mras,
President

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